| UNITED STATES DISTRICT COURT | |
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| SOUTHERN DISTRICT OF NEW YORK | ` |

SUSAN J. BALDWIN,

Plaintiff,

v.

11-CV-7591 (PGG)(HP)

GODDARD RIVERSIDE COMMUNITY CENTER,

Defendant.

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

For the reasons set forth in Defendant's Memorandum of Law in Support of its Motion for Summary Judgment, the Statement of Material Facts and the Declaration of Michael Tiliakos and the exhibits attached thereto, Defendant respectfully requests that the Court dismiss pursuant to Rule 56(c) of the F.R.C.P., Plaintiff's Title VII, New York State Human Rights Law and New York City Human Rights Law claims alleging that Defendant retaliated against her due to her participation in a former co-worker's discrimination lawsuit against Defendant and Plaintiff's New York City Human Rights Law claim that Defendant retaliated against her due to her opposition to housing discrimination.

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Dated: February 1, 2013 New York, New York

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